



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Inspection Report

Permit Number:	C0250005
Inspection Type:	TECHNICAL
Inspection Date:	Monday, September 29, 2014
Start Date/Time:	9/29/2014 2:00:00 PM
End Date/Time:	9/30/2014 12:30:00 PM
Last Inspection:	Tuesday, September 09, 2014

Inspector: Priscilla Burton,

Weather: sun 65F

InspectionID Report Number: 3979

Accepted by: DHADDOCK
10/21/2014

Representatives Present During the Inspection:	
OGM	Priscilla Burton
OGM	Steve Christensen
OGM	Joe Helfrich
OGM	Amanda Daniels
OGM	Cheryl Parker
OGM	Keenan Storrar
OGM	Lisa Reinhart
Company	Kirk Nicholes

Permittee: **ALTON COAL DEVELOPMENT LLC**

Operator: **ALTON COAL DEVELOPMENT LLC**

Site: **COAL HOLLOW**

Address: **463 North 100 West, Suite 1, CEDAR CITY UT 84720**

County: **KANE**

Permit Type: **PERMANENT COAL PROGRAM**

Permit Status: **ACTIVE**

Current Acreages

721.00	Total Permitted
329.00	Total Disturbed
	Phase I
	Phase II
	Phase III

Mineral Ownership

- Federal
- State
- County
- Fee
- Other

Types of Operations

- Underground
- Surface
- Loadout
- Processing
- Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

The site visit was made to introduce three new staff members to the site and to discuss the underground mining plan review Task 4652. The team took the opportunity to evaluate the north lease area which is under review for AVF qualities.

The coal seam was exposed in Pit 10 which has been opened on about one quarter of its length. Pit 10 may be the location of the proposed underground portals. The highwall in pit 10 is benched every 40 feet (two benches) and the alluvium height is approximately 30 ft. for a total of 110 ft. of cover. The 40 ft highwall above the portals would be shot-creted to prevent sloughing of the shale.

Pit 9 has been partially backfilled, but will not be completely backfilled until the stuck auger can be removed from the last panel. A second auger was used to complete mining in Pits 23 and 22 and was currently on the surface for maintenance. Pits 22 and 23 were partially backfilled. Auger panels were visible in Pit 22.

Pit 6 was backfilled in mid-July 2014. Pits 26 - 28 have been backfilled.

August and September have been unusually rainy this year. It was apparent that a large storm event had recently passed through the site. Documentation was provided of the design storm exceedence on October 20, 2014 (see incoming folder). On September 26, 2014 the site received 1.43 inches which exceeds the 6 yr. 10 hr storm event of 1 inch.

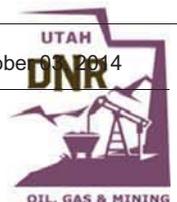
Inspector's Signature:

Priscilla Burton,

Inspector ID Number: 37

Digitally signed by Priscilla Burton
DN: cn=Priscilla Burton, o, ou,
email=priscillaburton@utah.gov, c=US
Date: 2014.10.21 16:11:04 -06'00'

Date Friday, October 03, 2014



REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
 - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
 - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS Check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1. Permits, Change, Transfer, Renewal, Sale

The underground mining proposal is under review as Task 4652. The coal seam was exposed in Pit 10 which has been opened on about one quarter of its length. The access to Pit 10 is through Pit 9. Pit 10 may be the location of the proposed underground portals, although the application describes the location as Pit 11. The highwall in pit 10 is benched every 40 feet (two benches) and the alluvium height is approximately 30 ft., for a total of 110 ft cover at this location. The proposed configuration of the underground access is shown on Dwg 5-3B of Task 4652, under review. The 40 ft highwall above the portals would be shot-creted to prevent sloughing of the shale. Pit 10 is flooded with water coming from the alluvium. The alluvial water management plan described in the MRP had not been instituted for this pit.

3. Topsoil

Topsoil was noted in a windrow on the contoured surface of pit 3 and 5, ready for redistribution over that surface. Topsoil was also noted windrowed on the east boundary of east of Pit 22 for redistribution over contoured pits 28 -25. Topsoil was also noted windrowed east of Pit 10. These stockpiles of topsoil will be used in reclamation this fall.

There was approximately 200,000 cu yards of subsoil stockpiled in the location of subsoil stockpile #2.

4.a Hydrologic Balance: Diversions

The Robinson Creek Diversion was observed during the inspection. Based upon conversations with Coal Hollow personnel and field observations, it was evident that a large storm event had occurred recently and impacted segments of the Robinson Creek Diversion and its outlet into the natural stream channel.

Excessive erosion was observed at the Robinson Creek diversion outlet (See picture). A significant amount of rip rap armoring had been dislodged and excessive cutting was observed on the side slopes of the diversion channel. The erosion has extended from the outlet up-gradient into the diversion channel itself (approximately 50 feet).

The Permittee must repair the outlet of the Robinson Creek diversion to the natural drainage channel to comply with the approved design shown in Figure 5-21, Robinson Creek Temporary Diversion Design & Details. If, based on the amount of material that was lost from recent storm events, it's not possible/practical to re-establish the outlet to conform to the approved design, the Permittee must design a new outlet armoring plan and submit it to the Division for approval prior to construction. The plans would require certification per R645-301-512.

The Permittee must repair the eroded section of the Robinson Creek Diversion immediately up-gradient of the outlet to the natural Robinson Creek drainage. The approved diversion ditch details shown on Figure 5-21, Robinson Creek Temporary Diversion Design & Details provides a cross-sectional drawing for the diversion. The drawing details a trapezoidal channel with a 3:1 slope for the side channels, 2 feet of channel bottom and a minimum depth of 5 feet. The impacted sections of the diversion will need to be repaired to conform to the approved design.

Ponding of water at lower end of final alignment of Robinson Creek (R645-301-731.121, R645-301-743.132 and R645-301-742.224). Watershed 3 is east of Lower Robinson Creek Reconstruction and Watershed 6 is west of the reconstruction. No surface water is designed to drain into the partially complete Lower Robinson Creek reconstructed ditch. Surface drainage from Watershed 3 is designed to be routed to Ditch 4, which is "planned to direct water from disturbed areas into sediment impoundment Pond 3" (Ch 7, p. 7-85). Ditch 4 is supposed to run continuously from the permit boundary at its northernmost point to Pond 3 (DWG 5-25), however, it is absent at its northern terminus and along much of the Lower Robinson Creek reconstructed ditch (see photo). This does not comply with the approved MRP stating, "All temporary ditches will be adjusted within the permitted active mining area in relation to the active pit, current spoils pile configuration, and reclamation" (Ch 7, 7-64). In the absence of Diversion 4, a significant contributing area drains from Watershed 3 into the reconstructed Lower Robinson Creek ditch (see photos). This allowed the large rain events in late September 2014 to fill the pond at the lower end of the final alignment.

R645-301-732.300, R645-301-742.313. Reconstruction has started on Lower Robinson Creek. The project appears to be headed in the right direction, but is behind on its reclamation sequence (Dwg. 5-38) and is without a clear work outline and completion date timeline. The current state of reclamation of Lower Robinson Creek has raised multiple concerns, including: the current excavation does not appear to meet the design specifications in Dwg. 5-21A, a large portion of ditch 4 has not been constructed, and runoff from the excavated piles of soil to the west of the Lower Robinson Creek reconstruction are allowed to drain off-site unmitigated (Ch 7, 7-46).

Ditch 4 overtopped and the outside berm requires maintenance.

4.b Hydrologic Balance: Sediment Ponds and Impoundments

All ponds contained water. Pond 3 was at the level of the spillway.

6. Disposal of Excess Spoil, Fills, Benches

The excess spoil pile is being contemporaneously reclaimed, areas were covered with subsoil and topsoil was stockpiled nearby, but the reclamation was not ongoing during our visit.

11. Contemporaneous Reclamation

Dwg 5-38 outlines 66 acres to be reclaimed in 2014. Sites that have been graded and covered with subsoil and topsoil will be mulched and seeded in October, next month.

12. Backfilling And Grading

Recent storm events have exacerbated the rill located on the north side of the reclaimed spoil pile adjacent to Pond 3. A number of options were discussed with the Permittee including :pocking, ripping along the contour, mounding the depressions on the top of the pile to eliminate ponding, excelsior matting and wood straw, and ensuring good surface roughening before topsoil placement.

22. Other

Pit 10 may be extended to the south to uncover the auger stuck in a panel in Pit 9. Pit 9 has been partially backfilled, but will not be completely backfilled until the stuck auger can be removed from the last panel. A second auger was used to complete mining in Pits 23 and 22 and was currently on the surface for maintenance. Pits 22 and 23 were partially backfilled. Auger panels were visible in Pit 22. Pits 6 was backfilled in mid-July 2014. Pits 26 - 28 have been backfilled.



Partially backfilled Pit 9 and entrance to pit 10.



Above: Pit 10. Below: Kirk Nichols addresses Cheryl Parker, Lisa Reinhart, Joe Helfrich, Steve Christensen, Amanda Daniels, and Keenan Storer





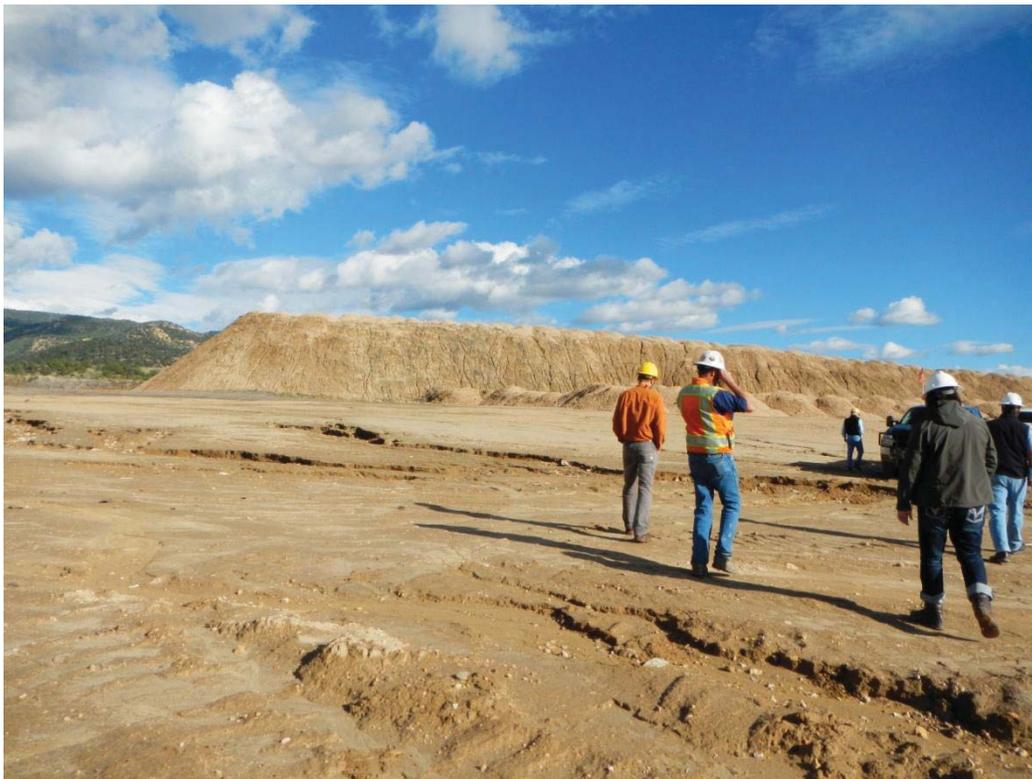
South end of Pit 9 where Trench 1 is under construction.



Auger bit under maintenance.



Above: Pit 22 partially backfilled.



Graded pit 6 and 200,000 cu yds of subsoil stockpiled in background.



Looking downhill at erosion rill located on the northwest side of the reclaimed spoil pile adjacent to Pond 3.



Spoil pile extending over former pits 7 & 8.



Erosion of subsoil on surface of the graded spoil pile will be roughened before topsoil placement.



Above: topsoil and subsoil piles in the vicinity of graded pits 25 - 28. Below: Topsoil windrowed on graded pits 3 and 5 adjacent to graded spoil pile.



Issue #4. Ditch #4 requires maintenance adjacent to the spoil pile.



Erosion of Re-aligned Robinson Creek outlet.



Pit 5 surface reclaimed in the fall 2013.